

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212.792-0048 • E: Jason@levinepstein.com

December 1, 2021

Via Electronic Filing

The Honorable Judge LaShann DeArcy Hall
U.S. District Court, Eastern District of New York
225 Cadman Plaza E.
Brooklyn, NY 11201

Re: *Veliz Montoya et al v. Premium Millwork, Inc. et al*
Case No.: 1:20-cv-02475-LDH-CLP

Dear Honorable Judge DeArcy:

This law firm represents Defendant Premium Millwork, Inc. (d/b/a Premium Millwork) and Julio Cuenca (together, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and 1(E), this letter respectfully serves to request an extension of Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including January 3, 2022.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel.¹ If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [*see* Dckt. Nos. 31-32] and requires additional time to gather information from Defendants to respond to the Complaint.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein
Joshua D. Levin-Epstein, Esq.
60 East 42nd Street, Suite 4700
New York, New York 10165
Tel. No.: (212) 792-0046
Email: Joshua@levinepstein.com
Attorneys for Defendants

VIA ECF: All Counsel

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendants to waive any defenses to personal jurisdiction due to improper service of process.